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**VIA ECF**

December 19, 2018

Hon. Paul G. Gardephe  
Thurgood Marshall  
United States Courthouse  
40 Foley Square, Room 2204  
New York, NY 10007

**Re: *Sportvision, Inc. et. al v. MLB Advanced Media, L.P., No. 18-cv-03025***

Dear Judge Gardephe:

We represent Defendant MLB Advance Media, LP ("MLBAM"), in the above captioned matter. Pursuant to Your Honor's Individual Rule of Practice IV(F), MLBAM and plaintiff Sportvision, Inc. et al. ("Sportvision") by and through their respective counsel, jointly submit the proposed Stipulated Protective Order ("Order") attached hereto as Exhibit A for consideration by the Court. The parties respectfully request that Your Honor enter the Order in this action.

As the parties' Proposed Protective Order deviates slightly from the Court's Model Protective Order, a blackline showing all deviations from the Court's Model Protective Order is attached as Exhibit B, in accordance with Your Honor's Individual Rules of Practice in Civil Cases.

We thank the Court for its consideration.

Sincerely,



Alan E. Littmann

Cc: All Counsel registered via ECF (via email)

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